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June 19, 2019

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: Great Western Ins. Co. v. Mark Graham, et al., Case No. 18-06249 (VSB)

Dear Judge Broderick:

We represent plaintiff Great Western Insurance Company (“Great Western”). Due to a family emergency, counsel for defendant Gregory Tolaram has requested, and we have agreed, to a postponement of Mr. Tolaram’s deposition on jurisdictional issues, previously scheduled for June 19, 2019. Counsel for Great Western and Mr. Tolaram have agreed that the deposition will now be taken on June 26, 2019. Consequently, Great Western and Mr. Tolaram request a slightly modified schedule to account for this delay, pushing all remaining deadlines back by one week.

To this end, Great Western and Mr. Tolaram propose the following schedule for jurisdictional discovery and briefing:

- June 26, 2019 – Deposition of Mr. Tolaram on jurisdictional issues via videoconference/telephone.
- July 3, 2019 – Mr. Tolaram shall complete his review of the deposition transcript and submit any errata sheets with respect thereto.
- July 10, 2019 – Great Western’s opposition to Mr. Tolaram’s motion to dismiss shall be due.
- July 17, 2019 – Mr. Tolaram’s reply brief shall be due.

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Great Western and Mr. Tolaram thank the Court for its consideration.

Respectfully submitted,

/s/ Stephen W. McInerney
Stephen W. McInerney
(admitted *pro hac vice*)

cc: Counsel of Record (via ECF)